



## Privacy Policy

Avon Psychology Service Limited, Company No. 13890883

The new data protection law, known as GDPR (General Data Protection Regulation) came into effect in May 2018. The purpose of GDPR is to set out standardised data protection laws that protect the rights of individuals to control how their personal information is processed and protected. This document details how Avon Psychology Service Limited collects and processes your personal data and how it complies with these laws.

### Contact details

Name: Jill Huber  
Position: Director, Avon Psychology Service Limited  
Email: info@avonpsychology.com

### Data Control

Jill Huber is the data controller for Avon Psychology Service Limited  
Jill Huber's ICO registration number is Z1972854

### The type of personal information we collect

We currently collect and process the following information:

- Personal data: name, address, telephone numbers, email addresses, home address, date of birth, GP contact details.
- Sensitive data: medical conditions (if relevant), medication, psychological history, details of current difficulties, relevant background information.
- Sensitive personal data: therapy records (including therapist notes, letters, reports, and questionnaires).
- Administrative information: dates, times, and locations of sessions; administrative emails

We will also process personal data pursuant to our legitimate interests in running the business such as invoices and receipts, accounts, and tax returns.

If you are funding your therapy through a private health insurer, we will also collect and process personal data provided by your insurer. This will include your basic contact information, health insurance policy number, authorisation numbers and dates of appointments.

## **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you. You also might be referred to us by a third party such as a medical doctor, your health insurance company or another agency directly involved in your care. The information is provided so that we can make contact with you, and to enable us to provide the best possible psychological therapy service for you. It also allows us to identify clients in cases when risk issues arise and the GP or crisis services need to be informed.

With the exception of situations in which significant risk arises, no information you provide will be passed on without your consent.

Under the GDPR, the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting Jill Huber.

(b) We have a contractual obligation.

Your personal information is also used to process payments for our services.

Your personal information may be used for us to inform you of any changes to this service.

## **Sharing your information**

The information we hold about you is kept in confidence, meaning that it is only used to provide the service that you have requested from us. However, there are exceptions to this confidentiality and there are times when we do need to share your information with other agencies.

- If your sessions are being funded by a private health insurance company, then your appointment dates will be shared with them for the purposes of invoicing. The insurance company may also request treatment plans and updates in order to authorise your therapy sessions.
- If your therapy has been instructed by a solicitor or an agency that is involved in coordinating your treatment, they may ask you to provide written consent for them to have access to your therapy records.
- Psychologists have regular formal supervision. This entails discussing your personal data with a supervisor who is a qualified professional also bound by confidentiality. No data will be shared that directly identifies you.

In exceptional circumstances, confidentiality may need to be breached.

- When another health provider needs to know information
- When disclosure is in the public interest to prevent a miscarriage of justice or where there is a legal duty.

- When there are concerns about risk of harm to you or to other adults or children.

In all such cases, the usual course of action would be for us to discuss our concerns and our proposed plans with you, unless this was assessed as potentially increasing the level of risk.

## How we store your personal information

Your privacy is taken seriously.

Once we receive your data, we make best efforts to ensure its security on our systems. All personal information provided is stored in compliance with EU General Data Protection Regulations rules.

We keep your personal information for the length of time specified by our governing bodies. Sensitive personal data is stored for a period of 7 years after the end of therapy. After this time, this data is destroyed at the end of each calendar year.

Administrative data is retained for up to six years as necessary, in the unlikely event there are queries from HMRC. Where it is not necessary to retain the data for six years, it is destroyed as soon as possible.

Your personal information will never be shared for marketing purposes.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [info@avonpsychology.com](mailto:info@avonpsychology.com) if you wish to make a request.

We have a right to refuse a request to delete a client's personal information where this is in the form of therapy records. The guidelines of the British Psychological Society and the Health and Care Professions Council require us to retain therapy records for 7 years after conclusion of therapy.

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to Jill Huber at [info@avonpsychology.com](mailto:info@avonpsychology.com)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>